

**CHAITMAN LLP**

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**Presentment Date: July 3, 2018 12:00 PM**  
**Objection Date: June 26, 2016**

*Attorneys for Defendants Trust Fund B U/W Edward  
F. Seligman F/B/O Nancy Atlas And Nancy Atlas, In  
Her Capacity As The Trustee Of The Trust Fund B  
U/W Edward Seligman F/B/O Nancy Atlas*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

TRUST FUND B U/W EDWARD F. SELIGMAN  
F/B/O NANCY ATLAS and NANCY ATLAS, in her  
capacity as the Trustee of the Trust Fund B U/W  
Edward Seligman F/B/O Nancy Atlas,

Defendants.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04885

(SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT  
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendants Trust Fund B U/W Edward F. Seligman F/B/O Nancy Atlas And Nancy Atlas, in her Capacity as the Trustee of the Trust Fund B U/W Edward Seligman F/B/O Nancy Atlas (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on December 02, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of the Defendants, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance and Request for Service of Papers on September 09, 2015 (ECF Doc. No. 18).

5. On behalf of the Defendants as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 03, 2015 (ECF Doc. No. 21).

6. However, after doing so, Defendant Nancy Atlas on behalf of all Defendants advised me that she was retaining other counsel.

7. To date no substitution of counsel has been filed and Defendants are unresponsive to my inquiries.

8. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendants’ counsel.

9. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendants.

Dated: June 12, 2018  
New York, New York

/s/ Helen Davis Chaitman